

ACE American Insurance Company (“ACE”) respectfully requests this Court to enter an order allowing Michael A. Varner (TX Bar No. 20499425, S.D. Tex. No. 15111) of Brown Sims, P.C. to withdraw as counsel of record, and substituting Thear J. Lemoine (La. Bar # 26383, S.D. Tex. No. 2861041) of Brown Sims, P.C., 1100 Poydras Street, 39th Floor, New Orleans, Louisiana 70163, as lead counsel of record and enrolling Gregory M. Burts (La. Bar No. 39133, S.D. Tex. No. 3734780) of Brown Sims, P.C. 1100 Poydras Street, 39th Floor, New Orleans, Louisiana 70163, as additional counsel of record.

The withdrawal of Mr. Varner as counsel of record, the substitution of Mr. Lemoine as lead counsel of record, and the addition of Mr. Burts as counsel of record will not delay any scheduled matter or deadlines.

WHEREFORE, ACE prays that this motion be granted and that Michael A. Varner of the law firm of Brown Sims, P.C. be withdrawn as counsel of record, that Thear J. Lemoine of the law

firm of Brown Sims, P.C. be substituted as lead counsel, and Gregory M. Burts, of the law firm of Brown Sims, P.C. be enrolled as additional counsel of record for ACE.

Respectfully submitted,

/s/ Michael A. Varner

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/s/ Thear J. Lemoine

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**Attorney for Defendant ACE
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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Michael A. Varner

Michael A. Varner

CERTIFICATE OF CONFERENCE

Undersigned counsel confirms that his office has conferred with counsel and he is informed that Plaintiff has no objections to the granting of this motion.

/s/ Michael A. Varner

Michael A. Varner

Considering the foregoing Unopposed Motion to Withdraw, Substitute and Enroll Counsel of Record, and finding it to be well-taken,

IT IS HEREBY ORDERED that the Motion is Granted, and Michael A. Varner (TX Bar No. 20499425, S.D. Tex. No. 15111) of Brown Sims is withdrawn as counsel of record for ACE American Insurance Company (“ACE”) in the above entitled matter; and

IT IS FURTHER ORDERED that Thear J. Lemoine (La. Bar No. 26383, S.D. Tex. No. 2861041) of Brown Sims, P.C., 1100 Poydras Street, 39th Floor, New Orleans, Louisiana 70163, shall be enrolled and substituted as lead counsel of record for ACE, and Gregory M. Burts (La. Bar No. 39133, S.D. Tex. No. 3734780) of Brown Sims, P.C. 1100 Poydras Street, 39th Floor, New Orleans, Louisiana 70163, be enrolled as additional counsel of record for ACE in the above entitled matter.

_____, Texas, this _____ day of _____, 2022.

UNITED STATES DISTRICT COURT JUDGE